

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

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January 4, 2018

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
Remedial Project Manager
Institutional Controls Coordinator
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 48 (October-December 2017)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from October-December 2017.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Contingency Measures:** On December 1, 2017, the Group's project coordinator spoke to Illinois EPA's representative regarding the status of the Contingency Measures Work Plan.
- **Supplemental Environmental Project (SEP):** On October 6, 2017, counsel for Johnson Controls, Inc. sent an email to representatives of the U.S. Department of Justice and EPA to confirm that the wire transfer of the SEP balance had successfully been completed on October 5, 2017.
- **Institutional Controls:** The Group's project coordinator continued to update the draft Institutional Controls Work Plan. The Group's project coordinator spoke to Illinois EPA's representative about the Institutional Controls Work Plan on December 1, 2017.
- **Operation and Maintenance:** At the request of EPA, the Group's project coordinator continued efforts to update the Operation and Maintenance Plan. Also, the following operation and maintenance activities were performed during the October-December 2017 period:

October 18	The Group's project coordinator confirmed that Munie Greencare Professionals ("Munie") planned to cut the vegetation on the Taracorp pile and 1555 State Street property during the week of October 23, 2017.
October 19	The Group's project coordinator spoke to Mr. John Birdsong, Granite City Sanitation Department, and advised him that the Group's contractor, Munie, planned to cut the vegetation on the Taracorp pile and 1555 State Street property during the week of October 23, 2017.
October 25	Munie cut the vegetation on the 1555 State Street property and surrounding areas at the site.
October 27	The Group's project coordinator notified Mr. John Birdsong, Granite City Sanitation Department, that Munie cut the vegetation on the Taracorp pile and 1555 State Street property on October 25, 2017.
November 1	The Group's project coordinator received an email from Mr. John Birdsong, Granite City Sanitation Department, acknowledging the completion of recent efforts to cut the vegetation at the site.
December 1	The Group's project coordinator spoke to Illinois EPA's representative regarding efforts to update the Operation and Maintenance Plan.
December 4	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
December 20	The Group's project coordinator sent an email and letter to EPA to provide log sheets and photographs documenting the results of the semi-annual operation and maintenance inspection performed at the site on December 4, 2017.
December 20	The Group's project coordinator sent a copy of the operation and maintenance inspection report to Beelman Trucking, at the request of Beelman Trucking, to document the results of the December 4, 2017 operation and maintenance inspection at Slough Road.

- **Project Coordination:** During the October-December 2017 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

October 4	Submitted Quarterly Progress Report 47 to EPA.
October 11	Sent an email to respond to a request from EPA's project manager and provide: (1) a list of residential properties where soil sampling and remediation was performed from 2010 to 2016; (2) a list of 28 residential properties where soil sampling was performed and no remediation was required; and (3) a list of 15 residential properties where access was denied or could not be obtained.
December 1	Spoke to Illinois EPA's representative regarding the Contingency Measures Work Plan, Institutional Controls Work Plan, and Operation and Maintenance Plan.
December 29	Sent a letter to EPA to provide Johnson Controls International PLC's Form 10-K to satisfy the Group's financial assurance requirements.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- Not applicable for this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- The Group anticipates that it will pay EPA's November 2017 bill for response costs in January 2018.
- The Group will continue to perform operation and maintenance activities at the site, as required.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan.
- The Group will address comments or questions, if any are received from EPA, regarding the six remote fill properties addressed in the Group's August 2017 memorandum.
- The Group will address comments, if any are received from EPA, on Environmental Works, Inc.'s Remedial Action Report, which was submitted to EPA in July 2017 to address the completion of residential soil remediation activities performed at the site in 2015 to 2017.
- The Group will address comments or questions from EPA, if any are received, on the Visual Canvassing Report and the Contingency Measures Work Plan, which were submitted to EPA in January 2017.
- The Group will continue to update the Institutional Controls Work Plan and will address comments, if any are received from EPA, on the Institutional Controls Work Plan previously submitted to EPA. In addition, the Group will address comments, if any are received from EPA, on the draft environmental covenants for Taracorp Inc.'s 16th Street property and the NL Industries Generator Site Group L.L.C.'s 1555 state Street property, which were submitted to EPA in August 2017.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties **Non-Responsive** **Non-Responsive** in June 2015 and one residential

property [Non-Responsive] in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties [Non-Responsive] in August 2016.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- Not applicable for this reporting period.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

- Not applicable for this reporting period.

7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)